

FILED

4/29/2025

1:25-cr-00239

Judge Sunil R. Harjani

Magistrate Judge Daniel P.

McLaughlin

Cat. 2/ Random

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DANIEL WILLIS

Violation: Title 18, United States
Code, Section 2252A(a)(2)(A)

UNDERSEAL

The SPECIAL MAY 2024 GRAND JURY charges:

On or about April 25, 2020, at New Lenox, in the Northern District of Illinois,
Eastern Division, and elsewhere,

DANIEL WILLIS,

defendant herein, did knowingly distribute and cause to be distributed child
pornography, as defined in Title 18, United States Code, Section 2256(8)(A), including
a file entitled “VID-20180106-WA0034”, a file entitled “8yo bj facial”, and a file
entitled “Vicky bondage”, using a means and facility of interstate and foreign
commerce, and in and affecting interstate and foreign commerce by any means,
including by computer;

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

FORFEITURE ALLEGATION

The SPECIAL MAY 2024 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 2252A as set forth in this Indictment, defendant shall forfeit to the United States of America any matter which contains visual depictions described in Title 18, United States Code, Section 2252A, and any property used and intended to be used to commit and to promote the commission of such offense, as provided by Title 18, United States Code, Section 2253(a).

2. The property to be forfeited includes, but is not limited to, the following specific property: a black iPhone XR with Serial Number C6KXN5C0KXKW.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY